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10 | *Attorneys for Defendants*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ZOYA KOVALENKO,

Plaintiff.

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KIRKLAND & ELLIS LLP, MICHAEL DE VRIES, MICHAEL W. DE VRIES, P.C., ADAM ALPER, ADAM R. ALPER, P.C., AKSHAY DEORAS, AKSHAY S. DEORAS, P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-cv-05990-HSG (TSH)

**DEFENDANTS' STATEMENT IN
SUPPORT OF PLAINTIFF ZOYA
KOVALENKO'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PLAINTIFF'S OPPOSITION TO
FILIPPATOS PLLC'S MOTION TO
QUASH AND DECLARATION IN
SUPPORT OF OPPOSITION (DKT NO.
232)**

DEFENDANTS' STATEMENT IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PLAINTIFF'S OPPOSITION
TO FILIPPATOS PLLC'S MOTION TO QUASH
[4:22-CV-05990-HSG (TS)]

1 Pursuant to Civil Local Rule 7-11(b), Defendants Kirkland & Ellis LLP, Michael De Vries,
 2 Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras,
 3 P.C., and Mark Fahey (collectively, the “Defendants”) respectfully submit this Statement in
 4 Support of Plaintiff Zoya Kovalenko’s Administrative Motion to File Under Seal Plaintiff’s
 5 Opposition to Filippatos PLLC’s Motion to Quash and Declaration in Support of Opposition (Dkt.
 6 No. 232) (the “Motion to Seal”).

7 Good cause exists to seal the redactions identified in the Motion to Seal for the reasons
 8 stated therein. Declaration of Zoya Kovalenko ISO Motion to Seal (Dkt. No. 232-1) (“Kovalenko
 9 Decl.”) ¶ 4. Disclosure of this information would prejudice both Defendants’ and Plaintiff’s
 10 interests in this action. *Id.* Less restrictive alternatives to sealing are not available, as Plaintiff has
 11 tailored her request to redact only confidential information. Kovalenko Decl. ¶ 5.

12 In light of the foregoing, Defendants respectfully request that the Court grant the Motion to
 13 Seal.¹

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 15 Dated: May 12, 2025

JOSEPH C. LIBURT
 16 Orrick, Herrington & Sutcliffe LLP

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 18 By: /s/ Joseph C. Liburt

19 Joseph C. Liburt
 20 Attorneys for Defendants

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 27 ¹ In accord with Civil Local Rule 7-11(b), Defendants hereby adopt Plaintiff’s amended proposed
 28 order granting the Motion to Seal. Dkt. No. 234.